

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

---

)

) Chapter 9

)

) Case No. 13-53846

)

) Hon. Steven W. Rhodes

)

**SECOND AMENDED NOTICE OF 30(B)(6) DEPOSITION  
OF GABRIEL ROEDER SMITH & COMPANY**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, you are hereby notified that the parties set forth in **Exhibit 1** will take the oral deposition of Gabriel Roeder Smith & Company (“Gabriel Roeder”), commencing on August 8, 2014, at 9:00 a.m. EST, and continuing thereafter until completed. Said deposition will be stenographically and videographically recorded. The deposition will be taken for the purposes of discovery, for use at court hearings or trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure. The deposition will take place at the offices of Clark Hill PLC, 500 Woodward Avenue, Suite 3500, Detroit, Michigan 48226.

Gabriel Roeder is required to designate, pursuant to Rule 30(b)(6), person(s) to testify on its behalf regarding the subject matters listed in the attached

**Schedule A.** Gabriel Roeder is requested to provide counsel, as soon as reasonably possible, with a written designation of the name(s) and position(s) of the persons who consent to testify on behalf of Gabriel Roeder.

Dated: July 31, 2014

/s/ Stephen C. Hackney

---

James H.M. Sprayregen, P.C.  
Ryan Blaine Bennett  
Stephen C. Hackney  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*Attorneys for Syncora Guarantee Inc., and Syncora  
Capital Assurance Inc.*

- and -

Stephen M. Gross  
David A. Agay  
Joshua Gadharf  
MCDONALD HOPKINS PLC  
39533 Woodward Avenue  
Bloomfield Hills, MI 48304  
Telephone: (248) 646-5070  
Facsimile: (248) 646-5075

*Local Counsel for Syncora Guarantee Inc. and  
Syncora Capital Assurance Inc.*

## **EXHIBIT 1**

<b>Party</b>	<b>Counsel for Party</b>
<i>Syncora Guarantee Inc. and Syncora Capital Assurance Inc.</i>	James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200  - and -  Stephen M. Gross David A. Agay Joshua Gadharf MCDONALD HOPKINS PLC 39533 Woodward Avenue Bloomfield Hills, MI 48304 Telephone: (248) 646-5070 Facsimile: (248) 646-5075
<i>Assured Guaranty Municipal Corp.</i>	Lawrence A. Larose Samuel S. Kohn Robert A. Schwinger CHADBOURNE & PARKE LLP 30 Rockefeller Plaza New York, NY 10112 Telephone: (212) 408-5100 Fax: (212) 541-5369 llarose@chadbourne.com skohn@chadbourne.com rschwinger@chadbourne.com

Party	Counsel for Party
<i>National Public Finance Guarantee Corp.</i>	<p>James F. Bendernagel, Jr.  Guy S. Neal  SIDLEY AUSTIN LLP  1501 K Street, N.W.  Washington, D.C. 20005  Telephone: (202) 736-8041  Fax: (202) 736-8711  jbendernagel@sidley.com  gneal@sidley.com</p> <p>-and-</p> <p>Jeffrey E. Bjork  Gabriel MacConaill  SIDLEY AUSTIN LLP  555 West Fifth Street, Suite 4000  Los Angeles, California 90013  Telephone: (213) 896-6000  Fax: (213) 896-6600  jbjork@sidley.com  gmacconaille@sidley.com</p>

Party	Counsel for Party
<i>Financial Guaranty Insurance Company</i>	Ernest J. Essad Jr. Mark R. James WILLIAMS, WILLIAMS, RATTNER & PLUNKETT, P.C. 280 North Old Woodward Avenue, Suite 300 Birmingham, MI 48009 Telephone: (248) 642-0333 Facsimile: (248) 642-0856 Email: EJEssad@wwrplaw.com Email: mrjames@wwrplaw.com  -and- Alfredo R. Pérez WEIL, GOTSHAL & MANGES LLP 700 Louisiana Street, Suite 1600 Houston, TX 77002 Telephone: (713) 546-5000 Facsimile: (713) 224-9511 Email: alfredo.perez@weil.com
<i>Wayne County, Michigan</i>	BUTZEL LONG, a professional Corporation  Max J. Newman (P51483) Beth Gotthelf (P38951) Attorneys for Wayne County Stoneridge West 41000 Woodward Ave Bloomfield Hills, MI 48304 (248) 258-2907 newman@butzel.com

Party	Counsel for Party
<i>Oakland County, Michigan</i>	<p>Joseph M. Fischer (P13452)  Robert A. Weisberg (P26698)  Christopher Grosman (P58693)  CARSON FISCHER, P.L.C.  4111 Andover Road, West- Second Floor  Bloomfield, Michigan 48302-1924  Telephone: (248) 644-4840  Facsimile: (248) 644-1832  JFischer@CarsonFischer.com  RWweisberg@CarsonFischer.com  CGrosman@CarsonFischer.com</p> <p>-and-</p> <p>Sara K. MacWilliams (P67805)  Jaye Quadrozzi (P71646)  YOUNG &amp; ASSOCIATES  27725 Stansbury Blvd., Suite 125  Farmington Hills, MI 48334  Telephone: (248) 353-8620  Email: efiling@youngpc.com  macwilliams@youngpc.com  quadrozzi@youngpc.com</p>

Party	Counsel for Party
<p><i>U.S. Bank National Association, as Trustee for the Water and Sewer Bonds</i></p>	<p>David E. Lemke (TN13586)  Paul S. Davidson (TN11789)  Heather J. Hubbard (TN23699)  WALLER LANSDEN DORTCH &amp;  DAVIS, LLP  511 Union Street, Suite 2700  Nashville, Tennessee 37219  Phone: (615) 244-6380  Fax: (615) 244-6804</p> <p>-and-</p> <p>Robert J. Diehl, Jr. (MI31264)  Jaimee L. Witten (P70068)  BODMAN PLC  1901 St. Antoine Street, 6th Floor  Detroit, Michigan 48226  Phone: (313) 393-7597  Fax: (313) 393-7579</p>

Party	Counsel for Party
<p><i>Detroit Fire Fighters Association, IAFF Local 344 and the Detroit Police Officers Association</i></p>	<p>Barbara A. Patek (P34666) Earle I. Erman (P24296) ERMAN, TEICHER, ZUCKER &amp; FREEDMAN, P.C. 400 Galleria Officentre, Suite 444 Southfield, MI 48034 Telephone: (248) 827-4100 Facsimile: (248) 827-4106 E-mail: bpatek@ermanteicher.com</p> <p>-and-</p> <p>James M. Moore (P17929) GREGORY, MOORE, JEAKLE &amp; BROOKS, PC 65 Cadillac Square, Suite 3727 Detroit, MI 48226-2893 Telephone: (313) 964-5600 Facsimile: (313) 964-2125 E-mail: jim@unionlaw.net</p> <p><i>Counsel for the DPOA</i></p> <p>-and-</p> <p>Christopher P. Legghio (P27378) Alidz Oshagan (P77231) LEGGHIO &amp; ISRAEL, PC 306 S. Washington, Suite 600 Royal Oak, MI 48067 Telephone: 248 398 5900 x 1131 Facsimile: 248 398 2662 E-mail: <a href="mailto:CPL@legghioisrael.com">CPL@legghioisrael.com</a></p> <p><i>Counsel for the DFFA</i></p>



### **Certificate of Service**

I, Stephen C. Hackney, hereby certify that on July 31, 2014, I caused the foregoing *Second Amended Notice of 30(b)(6) Deposition of Gabriel Roeder Smith and Company* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

/s/ Stephen C. Hackney

Stephen C. Hackney